



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

February 1, 2024

BY ECF

The Honorable Laura Taylor Swain
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Aimee Harris*, 22 Cr. 457 (LTS)

Dear Chief Judge Swain:

The Government respectfully submits this letter in response to the letter motion filed earlier today by defense counsel for Aimee Harris requesting the return of Harris's passport to facilitate her travel to New York for sentencing. (Dkt. 76). The defendant's request should be denied as moot: after the motion was filed, defense counsel and Pretrial Services informed the Government that the defendant does not possess a current passport and that the Pretrial Services Office does not have custody of a passport for the defendant. The Government is not aware of any reason why the defendant's lack of proper identification, and any attendant difficulty traveling, was not previously disclosed by the defendant to the Court.

The Pretrial Services Office further informed the Government today that the defendant's supervising Pretrial Services Officer in Florida directed the defendant to go to the defendant's local Department of Motor Vehicles office to obtain a non-driver state identification card, but that the defendant has refused to do so.

The Government requests that the defendant's sentencing be scheduled to be held in person on February 5, 2024, at 2:30 p.m. The Government further requests that the Court direct the defendant either to (i) obtain valid state identification which would permit her to travel by plane from Florida to New York, or (ii) make alternative travel arrangements, such as Amtrak or a commercial bus carrier, to appear at sentencing.

Respectfully submitted,

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Cc: Counsel of Record (by ECF)